

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

ACQIS LLC,  
a Texas limited liability company,

Plaintiff,

v

.

HON HAI PRECISION INDUSTRY  
CO., LTD., d/b/a/ FOXCONN,

Defendant.

No. 6:23-cv-00264-ADA

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff ACQIS LLC and Defendant Hon Hai Precision Industry Co., Ltd., d/b/a/ Foxconn file this Joint Motion for Entry of Protective Order. Having agreed upon the terms included therein, the undersigned parties respectfully request that the Court grant this Motion and enter the Stipulated Protective Order attached hereto as Exhibit A.

Dated: March 14, 2024

Respectfully submitted,

By: /s/ David A. Caine w/ permission  
Garrett C. Parish

David A. Caine  
Arnold & Porter Kaye Scholer LLP  
3000 El Camino Real, Building 5, Suite 500  
Palo Alto, CA 94306  
Tel: (650) 319-4500  
Fax: (650) 319-4700  
Email: david.caine@arnoldporter.com

*Of Counsel:*

Charles Everingham IV  
Texas State Bar No. 00787447  
E-mail: ce@wsfirm.com  
Claire Abernathy Henry  
Texas State Bar No. 00787447  
E-mail: claire@wsfirm.com  
Andrea L. Fair  
Texas State Bar No. 24078488  
E-mail: andrea@wsfirm.com  
Garrett C. Parish  
Email: gparish@wsfirm.com  
WARD, SMITH & HILL, PLLC  
1507 Bill Owens Parkway  
Longview, TX 75604  
Tel: (903) 757-6400  
Fax: (903) 757-2323

***Attorneys for Plaintiff***  
***ACQIS LLC***

By: /s/ Colby A. Davis w/ permission  
Garrett C. Parish

Mark D. Siegmund  
State Bar No. 24117055  
CHERRY JOHNSON SIEGMUND  
JAMES PLLC  
The Roosevelt Tower  
400 Austin Avenue, 9th Floor  
Waco, TX 76701  
Telephone: (254) 732-2242  
Facsimile: (866) 627-3509  
msiegmund@cjsjlaw.com

Noah A. Brumfield  
Colby A. Davis  
Megan Ines  
ALLEN & OVERY LLP  
1101 New York Avenue NW  
Washington, D.C. 20005  
Telephone: (202) 683-3847

Daniel Margolis  
ALLEN & OVERY LLP

1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 610-6375

*Attorneys for Defendant*  
*Hon Hai Precision Industry Co., Ltd.*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that on March 14, 2024 all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Garrett C. Parish  
Garrett C. Parish